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REMARKS

Claims 1-25 remain pending.

In the Final Office Action, the Examiner rejected claims 21-25 under 35 U.S.C. § 102(b) as being anticipated by Zuliani et al. (WO 97/35432); and rejected claims 1-20 under 35 U.S.C. § 103(a) as being unpatentable over Zuliani et al. in view of Jones et al. (U.S. Patent No. 5,018,197).

Claims 21-25:

Applicant respectfully reminds the Examiner of the duty to explicitly answer all material traversed in accordance with M.P.E.P. § 707.07(f): "Where the applicant traverses any rejection, the examiner should, if he or she repeats the rejection, take note of the applicant's argument and answer the substance of it" (M.P.E.P., pg. 700-123). Section 21 of the Final Office Action on page 10 contains no factual support or reasoning, and fails to "answer the substance" of Applicant's traversals. A bare statement that "they are not persuasive" does not answer the substance of anything. Applicant presented two detailed and reasoned traversals of the rejection of claim 21, and respectfully expects to have their substance answered. These traversals are repeated below in view of the newly detailed rejection of claim 21.

First, claim 21 requires among other things "a wireless communication interface to receive video data from a remote program; and a wired communication interface to send control data to the remote program." In other words, claim 21 requires that the same remote program that sent the video information also receives the control data. As explained in the previous Amendment, Zuliani et al. contains no explicit or implicit disclosure that a remote program in hub 4 sends video information over forward link 1.

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Even if it did, however, Zuliani et al. contains no explicit or implicit disclosure that such a program also receives input information over return link 2. Applicant notes in this regard that hub 4 is not a “remote program” as claimed. Rather, it is a physical “hub.” No evidence has been provided by the Examiner (e.g., from Fig. 2 of Zuliani et al.) that a single program in hub 4 both sends video data and receives control data as required by claim 21. Hence, Zuliani et al. fails to disclose all elements of claim 21.

Second, claim 21 requires a media adapter including, among other things, a wireless communication interface to receive video data from a remote program and a wired communication interface to send control data to the remote program. Neither unit 10, nor unit 9, nor antenna 8 in Zuliani et al. includes both a wireless communication interface and a wired communication interface as set forth in claim 21.

Although page 2 of the Final Office Action reads the claimed wired interface on element 7 of Fig. 1, a brief resort to the text of Zuliani et al. reveals that this component is “a typical user 7” (page 5, lines 11-15). A user does not reasonably correspond to the claimed “wired interface.” Rather, as is apparent from Fig. 3 of Zuliani et al. the user side of the system in Fig. 1 includes a single wireless interface 51/74, and no wired communications interfaces as claimed. There are no wired communication links, for example, to satellite 3 in Fig. 1 of Zuliani et al.

Thus, Zuliani et al. fails to disclose all elements of claim 21, and a prima facie case of anticipation has not been established. The 35 U.S.C. § 102(b) rejection of claim 21 should be withdrawn for at least these reasons.

Dependent claims 22-25 are allowable at least by virtue of their dependence on claim 21.

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Claims 1-20:

To establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See M.P.E.P. § 2143.

A *prima facie* case of obviousness has not been established for claims 1, 8, and 16, because the combination of references, even if such were proper, fails to teach or suggest all limitations of the claims. Each of claims 1, 8, and 16 requires, among other things, that video information be received from, and input information be sent to, the same "remote program." As explained above with regard to claim 21, hub 4 is not a program, and no evidence, explicit or implicit, has been provided that hub 4 includes a single program that sends video information and received input information over different communication links. A *prima facie* case of obviousness has not been established for claims 1, 8, and 16 for at least this reason.

Also, with respect to claim 16, no evidence has been provided from Zuliani et al. that communication link 2 has a "lower associated latency" than communication link 1 in Fig. 1. A *prima facie* case of obviousness has not been established for claim 16 for at least this additional reason.

Dependent claims 2-7, 9-15, and 17-20 are allowable at least by virtue of their dependence on claims 1, 8, and 16.

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A *prima facie* case of obviousness also has not been established, because at least Zuliani et al. teaches away from the proposed combination. See M.P.E.P. § 2145(X)(D) (“proposed modification cannot render the prior art unsatisfactory for its intended purpose or change the principle of operation of a reference”). Zuliani et al. appears to disclose only a communication system making “combined use of two satellite systems *both operating in a one-way mode*” (page 4, line19, emphasis added) Hence, at least Zuliani et al. teaches away from the proposed addition of bidirectional communication links, because it explicitly teaches adding a second, unidirectional link for upstream communication.

Also, to incorporate a bidirectional, cable-based communication link from Jones et al. into unidirectional, satellite-based context of Zuliani et al. would necessarily change the principles of operation of both references. Zuliani et al. teaches or suggests only one-way transmission through the atmosphere; by contrast, Jones et al. teaches or suggests only two-way communication via cables. To change either reference so fundamentally would necessarily change its principles of operation. Hence, the references teach away from the proposed combination. A *prima facie* case of obviousness has not been established for claims 1-20 for this additional reason.

Reconsideration and allowance of claims 1-25 are respectfully requested.

In the event that any outstanding matters remain in this application, Applicants request that the Examiner contact Alan Pedersen-Giles, attorney for Applicants, at the number below to discuss such matters.

To the extent necessary, a petition for an extension of time under 37 C.F.R. § 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

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including extension of time fees, to Deposit Account No. 50-0221 and please credit any excess fees to such deposit account.

Respectfully submitted,

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